

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

AMERICAN AIRLINES, INC., §
§
Plaintiff, §
§
v. § Civil Action No. 4:23-cv-00860-P
§
SKIPLAGGED, INC., §
§
Defendant. §

**[PROPOSED] ORDER GRANTING DEFENDANT SKIPLAGGED, INC.'S MOTION TO
COMPEL RESPONSES TO DISCOVERY**

On this day, the Court considered Defendant Skiplagged, Inc's ("Skiplagged") Motion to Compel Responses to Discovery ("Motion"). The Court, having considered the Motion, the arguments of counsel, and the applicable law, hereby **GRANTS** the Motion.

IT IS THEREFORE ORDERED THAT within seven says of the date of this Order, Plaintiff American Airlines, Inc. ("AA") shall:

1. withdraw all boilerplate and form objections;
2. withdraw the vague and ambiguous objections to Requests for Production 1-9, 11-12, 16, 18, 20-34, 40, 42-43, 45-52, 54-55, 58, 61-63, 66-67, 69-71, 75-81, 83-89, 92-102, Interrogatories 3, 13, 18, 19, 21, and Requests for Admission 1-20, 22-29;
3. amend each discovery response to remove the improper "subject to" response and state whether documents and information have been produced and what documents and information are being withheld or not searched for on the basis of AA's objections;
4. withdraw all objections and provide full and complete responses and production to Interrogatories 2, 4-6, 8, 11 and Requests for Production 12, 28-29, 34, 50;

5. withdraw all objections and provide full responses and production to Requests for Production 9, 12, 28, 40, 41, 50-51, 58;
6. withdraw all objections and provide full responses and production to Requests for Production 56-58, 60-68, 75, 82-85, 87-88, 90-91 and Interrogatories 10, 17, 22-23;
7. withdraw all objections and provide full responses to Interrogatories 2, 8 and Requests for Production 4, 10-11, 24, 45.

IT IS FURTHER ORDERED THAT that AA pay Skiplagged the reasonable and necessary attorneys' fees it incurred in preparing and pursuing its Motion. Payment amount shall be determined at a later date.

IT IS SO ORDERED.

Signed this _____ day of _____, 2024.

MARK T. PITTMAN
UNITED STATES DISTRICT JUDGE